# Exhibit 4

# Mariano, Andrea

**From:** Andrew Choung <achoung@glaserweil.com>

Sent: Thursday, March 8, 2018 5:20 PM

**To:** Comeau, Jeffrey D.

Cc: Rex Hwang; Jason Sheasby; Thomas Burke; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith (melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler,

Joseph; Chris Bunt; Soobert, Allan M.

**Subject:** [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-

JRG-RSP

# --- External Email: Do not open attachments or click links from unknown senders ---

Hello Jeff, all the data reviewed or relied upon was produced. Thank you.

Best regards, Andrew Choung

#### **GLASER WEIL**

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067 Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545 US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247

E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio



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From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Wednesday, March 7, 2018 5:22 PM

To: Andrew Choung <achoung@glaserweil.com>

Cc: Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby <jsheasby@irell.com>; Thomas Burke

<tburke@glaserweil.com>; Charley Ainsworth <charley@pbatyler.com>; Deana Attaway@pbatyler.com)

<dattaway@pbatyler.com>; Jung, Soyoung <soyoungjung@paulhastings.com>; Guy Rodgers

<grodgers@glaserweil.com>; Kennerly, Christopher W. <chriskennerly@paulhastings.com>; Melissa Richards Smith

(melissa@gillamsmithlaw.com) < melissa@gillamsmithlaw.com>; Team Samsung KAIST

<rcbunt@pbatyler.com>; Soobert, Allan M. <allansoobert@paulhastings.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

Have you produced all the data that Mr. Weinstein's team received from Strategy Analytics for his regression analysis?

Regards,

Jeff

From: Comeau, Jeffrey D.

Sent: Wednesday, February 28, 2018 10:38 AM

To: Andrew Choung; Soobert, Allan M.

**Cc:** Rex Hwang; Jason Sheasby; Thomas Burke; Charley Ainsworth; Deana Attaway (<u>dattaway@pbatyler.com</u>); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith (<u>melissa@gillamsmithlaw.com</u>); Team Samsung

KAIST; Rumpler, Joseph; Chris Bunt

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

You've misunderstood what I said regarding Dr. Becker's availability. I did not say you could choose either day, just that he'd be available one of those days and we'd get back to you regarding which. I can now confirm that Dr. Becker will be made available for deposition on March 15.

Regards, Jeff

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

**Sent:** Wednesday, February 28, 2018 9:55 AM **To:** Comeau, Jeffrey D.; Soobert, Allan M.

**Cc:** Rex Hwang; Jason Sheasby; Thomas Burke; Charley Ainsworth; Deana Attaway (<u>dattaway@pbatyler.com</u>); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith (<u>melissa@gillamsmithlaw.com</u>); Team Samsung KAIST: Rumpler, Joseph; Chris Bunt

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Hello Allan, Jeff,

We appreciate your confirming Becker's availability on Mar 15 or 16. We will let you know which we day we would like to depose him as we hash out the rest of the schedule. With respect to Mr. Weinstein, we disagree with your position. He will be produced in the second week as we indicated. With respect to Becker's supplemental report, as we specifically noted in my prior email, we understand it will be strictly limited to the regression analysis data – this is not a generic right to supplement. Finally, I've now made multiple attempts to discuss comprehensive deposition scheduling with specific dates. Since expert depositions start next week, please let me know when you are available today or tomorrow to discuss. Thank you.

Best regards, Andrew Choung

GLASER WEIL

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545
US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247
E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Wednesday, February 28, 2018 9:01 AM

**To:** Andrew Choung <a href="mailto:achoung@glaserweil.com">achoung@glaserweil.com</a>>; Soobert, Allan M. <a href="mailto:allansoobert@paulhastings.com">allansoobert@paulhastings.com</a>>

Cc: Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby <jsheasby@irell.com>; Thomas Burke

<tburke@glaserweil.com>; Charley Ainsworth <charley@pbatyler.com>; Deana Attaway (dattaway@pbatyler.com)

<<u>dattaway@pbatyler.com</u>>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy Rodgers

# Case 2:16-cv-01314-JRG Document 246-5 Filed 03/21/18 Page 4 of 11 PageID #: 15198

<grodgers@glaserweil.com>; Kennerly, Christopher W. <chriskennerly@paulhastings.com>; Melissa Richards Smith (melissa@gillamsmithlaw.com) <melissa@gillamsmithlaw.com>; Team Samsung KAIST

<TeamSamsungKAIST@paulhastings.com>; Rumpler, Joseph <josephrumpler@paulhastings.com>; Chris Bunt <rcbunt@pbatyler.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

Dr. Becker will be available for deposition at least one of those days (March 15 or 16). Accordingly, we will serve an expert rebuttal report on regression by March 9.

We disagree that Mr. Weinstein's deposition needs to occur after March 9, as you seem to suggest below. He should be prepared to defend his opinions now. We intend to depose Mr. Weinstein next week. Please provide his availability.

Regards, Jeff

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

Sent: Tuesday, February 27, 2018 3:02 PM

**To:** Soobert, Allan M.

Cc: Rex Hwang; Jason Sheasby; Thomas Burke; Charley Ainsworth; Deana Attaway (dattaway (pbatyler.com); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith (melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph; Comeau, Jeffrey D.; Chris Bunt

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Hello Allan,

Based on our call, we understand that Defendants would like to serve a second Becker report on Mar 9 on the regression analysis data. As we discussed, this impacts the limited deposition period since it necessarily pushes Becker's deposition to the second week and additionally means that Mr. Weinstein's deposition would now need to take place in the second week as well. So, here is the accommodation that we propose – we can agree to an extension to Mar 9 if Becker strictly limits his supplement to the regression analysis data and he is made available on Mar 15 or 16. We think this is a very reasonable accommodation and also helps to start solidifying the deposition schedule. Thank you.

Best regards, **Andrew Choung** 

#### **GLASER WEIL**

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067 Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545 US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247 E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Andrew Choung

Sent: Tuesday, February 27, 2018 1:04 PM

To: 'Comeau, Jeffrey D.' <jeffreycomeau@paulhastings.com>; Soobert, Allan M. <allansoobert@paulhastings.com>;

Chris Bunt <rcbunt@pbatyler.com>

Cc: Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby <jsheasby@irell.com>; Thomas Burke

<tburke@glaserweil.com>; Charley Ainsworth <charley@pbatyler.com>; Deana Attaway@pbatyler.com)

<dattaway@pbatyler.com>; Jung, Soyoung <soyoungjung@paulhastings.com>; Guy Rodgers

<grodgers@glaserweil.com>; Kennerly, Christopher W. <chriskennerly@paulhastings.com>; Melissa Richards Smith

# Case 2:16-cv-01314-JRG Document 246-5 Filed 03/21/18 Page 5 of 11 PageID #: 15199

(<u>melissa@gillamsmithlaw.com</u>) < <u>melissa@gillamsmithlaw.com</u>>; Team Samsung KAIST < <u>TeamSamsungKAIST@paulhastings.com</u>>; Rumpler, Joseph < <u>josephrumpler@paulhastings.com</u>> **Subject:** RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

So you are unwilling to discuss the impact of your extension request on the deposition schedule?

Best regards, Andrew Choung

**GLASER WEIL** 

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545
US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247
E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Tuesday, February 27, 2018 12:54 PM

**To:** Andrew Choung <a href="mailto:achoung@glaserweil.com">; Soobert, Allan M. <a href="mailto:allansoobert@paulhastings.com">; Chris Bunt < rcbunt@pbatyler.com</a>>

**Cc:** Rex Hwang <<u>rhwang@glaserweil.com</u>>; Jason Sheasby <<u>isheasby@irell.com</u>>; Thomas Burke

<<u>tburke@glaserweil.com</u>>; Charley Ainsworth <<u>charley@pbatyler.com</u>>; Deana Attaway@pbatyler.com)

<<u>dattaway@pbatyler.com</u>>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy Rodgers

<grodgers@glaserweil.com>; Kennerly, Christopher W. <chriskennerly@paulhastings.com>; Melissa Richards Smith (melissa@gillamsmithlaw.com) <melissa@gillamsmithlaw.com>; Team Samsung KAIST

<TeamSamsungKAIST@paulhastings.com>; Rumpler, Joseph <josephrumpler@paulhastings.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

This is not a call to discuss deposition scheduling. We are proposing that Plaintiff attempt to alleviate the prejudice caused by its late production of regression data by agreeing to a very reasonable extension. If you do not agree, we'll file our emergency motion. If you are concerned about the impact of Plaintiff's late production of data on the deposition schedule, you can withdraw your expert's opinions related to regression. That's the only way to cure the prejudice to Defendants anyway.

Regards, Jeff

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

**Sent:** Tuesday, February 27, 2018 11:01 AM

To: Comeau, Jeffrey D.; Soobert, Allan M.; Chris Bunt

**Cc:** Rex Hwang; Jason Sheasby; Thomas Burke; Charley Ainsworth; Deana Attaway (<a href="mailto:dattaway@pbatyler.com">dattaway@pbatyler.com</a>); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith (<a href="mailto:melissa@gillamsmithlaw.com">melissa@gillamsmithlaw.com</a>); Team Samsung

KAIST; Rumpler, Joseph

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

We can do 1:30pm – Please send me depo dates in advance to make the call go faster. Thank you.

1-800-747-5150 2826245

# Case 2:16-cv-01314-JRG Document 246-5 Filed 03/21/18 Page 6 of 11 PageID #: 15200

Best regards, Andrew Choung

**GLASER WEIL** 

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545
US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247
E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Tuesday, February 27, 2018 10:40 AM

To: Andrew Choung <achoung@glaserweil.com>; Soobert, Allan M. <allansoobert@paulhastings.com>

Cc: Rex Hwang <a href="mailto:rhwang@glaserweil.com">rhwang@glaserweil.com</a>; Jason Sheasby <a href="mailto:sheasby@irell.com">jsheasby@irell.com</a>; Thomas Burke

<<u>tburke@glaserweil.com</u>>; Chris Bunt <<u>rcbunt@pbatyler.com</u>>; Charley Ainsworth <<u>charley@pbatyler.com</u>>; Deana Attaway (<u>dattaway@pbatyler.com</u>) <<u>dattaway@pbatyler.com</u>>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy Rodgers <<u>grodgers@glaserweil.com</u>>; Kennerly, Christopher W. <<u>chriskennerly@paulhastings.com</u>>; Melissa Richards

Smith (<u>melissa@gillamsmithlaw.com</u>) < <u>melissa@gillamsmithlaw.com</u>>; Team Samsung KAIST

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Sorry, I'm not available at 2 pm today. I'm available 12:00-2:00 pm and 3:30-4:30 pm PT. Let me know if you would like to talk during one of those windows.

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

**Sent:** Tuesday, February 27, 2018 10:29 AM **To:** Comeau, Jeffrey D.; Soobert, Allan M.

Cc: Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith

(melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Yes, let's talk at 2pm – Since this obviously impacts the deposition schedule, please be prepared to provide dates. Thank you.

Best regards, Andrew Choung

**GLASER WEIL** 

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545
US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247
E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Tuesday, February 27, 2018 10:12 AM

To: Andrew Choung <achoung@glaserweil.com>; Soobert, Allan M. <allansoobert@paulhastings.com>

Cc: Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby <jsheasby@irell.com>; Thomas Burke

<<u>tburke@glaserweil.com</u>>; Chris Bunt <<u>rcbunt@pbatyler.com</u>>; Charley Ainsworth <<u>charley@pbatyler.com</u>>; Deana Attaway@pbatyler.com
>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy Rodgers <<u>grodgers@glaserweil.com</u>>; Kennerly, Christopher W. <<u>chriskennerly@paulhastings.com</u>>; Melissa Richards

Smith (melissa@gillamsmithlaw.com) <melissa@gillamsmithlaw.com>; Team Samsung KAIST

<TeamSamsungKAIST@paulhastings.com>; Rumpler, Joseph <josephrumpler@paulhastings.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

Our proposal is that Plaintiff agree that Defendants have until March 9 to submit a rebuttal expert report addressing the regression analysis and any impact of that analysis on damages. Let us know by close of business, or we'll proceed with our emergency motion. If you want to discuss, I'm available between 12 pm and 2 pm PT today.

Regards, Jeff

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

**Sent:** Tuesday, February 27, 2018 7:06 AM **To:** Comeau, Jeffrey D.; Soobert, Allan M.

Cc: Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com); Jung, Soyoung; Guy Rodgers; Kennerly, Christopher W.; Melissa Richards Smith

(<u>melissa@qillamsmithlaw.com</u>); Team Samsung KAIST; Rumpler, Joseph

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Hello Jeff,

Alan did not raise this issue at the hearing. And it's not clear from your email what exactly you are asking. It sounds like you are proposing to submit a separate rebuttal report addressing just the regression analysis. Is that correct? If so, by what date are you proposing to serve this separate report? While we disagree with your characterization of any prejudice, we're willing to consider your request but need to know the specifics.

Best regards, Andrew Choung

**GLASER WEIL** 

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Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545
US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247
E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

**From:** Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Monday, February 26, 2018 8:44 PM

To: Andrew Choung <a href="mailto:achoung@glaserweil.com">achoung@glaserweil.com</a>>

Cc: Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby <jsheasby@irell.com>; Thomas Burke

<<u>tburke@glaserweil.com</u>>; Chris Bunt <<u>rcbunt@pbatyler.com</u>>; Charley Ainsworth <<u>charley@pbatyler.com</u>>; Deana Attaway@pbatyler.com) <<u>dattaway@pbatyler.com</u>>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy

Rodgers <grodgers@glaserweil.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Kennerly, Christopher W.

<chriskennerly@paulhastings.com>; Melissa Richards Smith (melissa@gillamsmithlaw.com)

<<u>melissa@gillamsmithlaw.com</u>>; Team Samsung KAIST <<u>TeamSamsungKAIST@paulhastings.com</u>>; Rumpler, Joseph

<josephrumpler@paulhastings.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

By close of business tomorrow, please confirm your agreement to the one-week extension requested in my e-mail below or we will file an emergency motion with the Court seeking appropriate relief.

Regards,

Jeff

**From:** Comeau, Jeffrey D.

**Sent:** Friday, February 23, 2018 12:16 PM

To: Andrew Choung

Cc: Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com); Jung, Soyoung; Guy Rodgers; Soobert, Allan M.; Kennerly, Christopher W.; Melissa Richards

Smith (<u>melissa@gillamsmithlaw.com</u>); Team Samsung KAIST; Rumpler, Joseph

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Andrew,

We have been working diligently with our expert, but it has become clear that addressing the late-produced regression data is not workable under the current schedule. Regardless of your intentions, Defendants have been prejudiced by the delay. We request that Plaintiff agree to a one-week extension for any supplemental or stand-alone report addressing the regression analysis. If Plaintiff will not agree, we will need to raise the issue with Judge Payne at Monday's hearing, and request appropriate relief.

Regards, Jeff

**From:** Andrew Choung [mailto:achoung@glaserweil.com]

Sent: Thursday, February 15, 2018 4:33 PM

To: Comeau, Jeffrey D.

**Cc:** Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway (dattaway@pbatyler.com); Jung, Soyoung; Guy Rodgers; Soobert, Allan M.; Kennerly, Christopher W.; Melissa Richards Smith (melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph

Subject: [EXT] RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Hello Jeff,

It looks like the data file had failed to load to the download link. We're still looking into why that happened. In the meantime, Guy will send a new download link. Please check and then confirm that the data file came through. Thank you.

Best regards, Andrew Choung

**GLASER WEIL** 

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067 Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545 US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247

E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Andrew Choung

Sent: Thursday, February 15, 2018 4:13 PM

To: 'Comeau, Jeffrey D.' < jeffreycomeau@paulhastings.com>

Cc: Rex Hwang <a href="mailto:rhwang@glaserweil.com">rhwang@glaserweil.com</a>; Jason Sheasby <a href="mailto:sheasby@irell.com">jsheasby@irell.com</a>; Thomas Burke

<<u>tburke@glaserweil.com</u>>; Chris Bunt <<u>rcbunt@pbatyler.com</u>>; Charley Ainsworth <<u>charley@pbatyler.com</u>>; Deana Attaway (<u>dattaway@pbatyler.com</u>) <<u>dattaway@pbatyler.com</u>>; Jung, Soyoung <<u>soyoungjung@paulhastings.com</u>>; Guy Rodgers <grodgers@glaserweil.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Kennerly, Christopher W.

<chriskennerly@paulhastings.com>; Melissa Richards Smith (melissa@gillamsmithlaw.com)

<<u>melissa@gillamsmithlaw.com</u>>; Team Samsung KAIST <<u>TeamSamsungKAIST@paulhastings.com</u>>; Rumpler, Joseph

<josephrumpler@paulhastings.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Hello Jeff,

The data file should be in the production of Feb. 9 that responded to Ms. Jung's original request. We're checking to see what the problem is and will get back to you.

Best regards, **Andrew Choung** 

**GLASER WEIL** 

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067 Main: 310.553.3000 | Direct: 310.282.6245 | Fax: 310.785.3545 US Mobile: 213.840.0879 | KR Mobile: +82 (010) 4789.4247

E-Mail: achoung@glaserweil.com | www.glaserweil.com | Link to Bio

From: Comeau, Jeffrey D. [mailto:jeffreycomeau@paulhastings.com]

Sent: Thursday, February 15, 2018 2:38 PM

To: Jung, Soyoung <soyoungjung@paulhastings.com>; Guy Rodgers <grodgers@glaserweil.com>; Soobert, Allan M. <allansoobert@paulhastings.com>; Kennerly, Christopher W. <chriskennerly@paulhastings.com>; Melissa Richards

Smith (melissa@gillamsmithlaw.com) <melissa@gillamsmithlaw.com>; Team Samsung KAIST

<TeamSamsungKAIST@paulhastings.com>; Rumpler, Joseph <josephrumpler@paulhastings.com>

Cc: Andrew Choung <achoung@glaserweil.com>; Rex Hwang <rhwang@glaserweil.com>; Jason Sheasby

<isheasby@irell.com>; Thomas Burke <tburke@glaserweil.com>; Chris Bunt <rcbunt@pbatyler.com>; Charley Ainsworth

<charley@pbatyler.com>; Deana Attaway (dattaway@pbatyler.com) <dattaway@pbatyler.com>

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Guy,

Plaintiff still has not produced the raw data that Roy Weinstein relied upon for his regression analysis. This is a plain violation of Fed. R. Civ. P. 26(a)(2)(B)(ii), which requires an expert report contain "the facts or data considered by the witness in forming them." We also requested this data twice last week and did not receive the courtesy of a response.

Please confirm today you will produce the data immediately and not oppose an appropriate extension of time for Defendants' rebuttal damages report(s), or we will have no choice but to seek relief from the Court on an expedited basis. Given the delay already and prejudice to Defendants, we reserve the right to seek preclusion of any testimony relating to Weinstein's regressions analysis.

Regards, Jeff

From: Jung, Soyoung

**Sent:** Friday, February 09, 2018 4:45 PM

To: Guy Rodgers; Soobert, Allan M.; Kennerly, Christopher W.; Comeau, Jeffrey D.; Melissa Richards Smith (melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph

Cc: Andrew Choung; Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com)

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Counsel,

Please produce the requested materials immediately. Any further delay continues to prejudice our ability to assess Plaintiff's damages report and prepare our rebuttal report.

Regards, Soyoung

From: Jung, Soyoung

Sent: Thursday, February 8, 2018 5:08 PM

To: Guy Rodgers; Soobert, Allan M.; Kennerly, Christopher W.; Comeau, Jeffrey D.; Melissa Richards Smith

(melissa@gillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph

Cc: Andrew Choung; Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattaway@pbatyler.com)

Subject: RE: KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Guy,

Plaintiff has not produced all references cited in Roy Weinstein's report. We need the following documents and information:

- All documents cited in the report not previously produced, including references to sources online (see, e.g., Footnotes 217, 231, 232, 334, 364, 365)
- All Exhibits in native form
- All data used for the regression analysis in native form, including statistical code, and the results of the regression model relied upon

Please produce the above immediately.

Regards, Soyoung

From: Guy Rodgers [mailto:grodgers@glaserweil.com]

**Sent:** Wednesday, February 7, 2018 8:17 PM

To: Soobert, Allan M.; Kennerly, Christopher W.; Comeau, Jeffrey D.; Melissa Richards Smith (melissa@qillamsmithlaw.com); Team Samsung KAIST; Rumpler, Joseph; Jung, Soyoung

Cc: Andrew Choung; Rex Hwang; Jason Sheasby; Thomas Burke; Chris Bunt; Charley Ainsworth; Deana Attaway

(dattawav@pbatvler.com)

Subject: [EXT] KAIST IP US LLC v. Samsung Electronics Co., Ltd., et al., No. 2:16-cv-01314-JRG-RSP

Counsel.

We discovered an inadvertent error with the exhibit numbering in Dr. Kuhn's report. We are providing a copy that replaces the pages with the corrected numbering and matching relabeled exhibits (Exhibit 3 reflects the corrected numbering).

https://www.sendthisfile.com/EaIYY0oRH9WI7rN9UHICk1Ih

The password is the same.

Thank you, Guy

Glaser Weil

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# Guy M. Rodgers | Attorney

10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067 Main: 310.553.3000 | Direct: 310.282.6208 | Fax: 310.785.3508 Email: grodgers@glaserweil.com | www.glaserweil.com | bio



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